## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: CHAPTER 13 CASE NO.:

**ELMER RICHARDSON** 

19-13557-JDW

## **OBJECTION TO EXEMPTIONS**

COMES NOW Locke D. Barkley, the Chapter 13 Trustee (the "Trustee"), by and through counsel, and objects to the Debtor's claimed exemptions as follows:

The 120 acres of farmland in Panola County is not subject to exemption pursuant to Miss Code Ann. § 85-3-21 because it is not homestead property.

WHEREFORE, PREMISES CONSIDERED, the Trustee requests that this Court enter its order sustaining the Objection and ordering that the above referenced property claimed as exempt be disallowed. The Trustee prays for other such general and specific relief which this Court may deem just.

Dated: September 25, 2019.

Respectfully submitted,

LOCKE D. BARKLEY CHAPTER 13 TRUSTEE

BY: /s/ Melanie T. Vardaman

MELANIE T. VARDAMAN (MSB# 100392)

W. Jeffrey Collier (MSB 10645) Attorneys for the Chapter 13 Trustee

6360 I-55 North, Suite 140 Jackson, Miss. 39211

(601) 355-6661

mvardaman@barkley13.com

## **CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: September 25, 2019

/s/ Melanie T. Vardaman MELANIE T. VARDAMAN